

v7/94

ENVIRONMENTAL PROTECTION AGENCY TSCA INSPECTION CHECKLIST

Philip Env
734 Lucile St.
Seattle, WA

Facility Representative / Title

11-10-98
Inspection Date/TimeMary Eileen Hickman 1915
Inspector Name / ID

Yes No

GENERAL

- ☒ Has any PCB equip been converted to PCB-Cont or Non-PCB equip?
☒ If yes, was PCB concentration tested after 3 mos of service? Obtain results
☒ Have any PCB spills occurred at the facility? Obtain details
 Not in 1951 Year 1998
 PCBs resulting from the cleanup and removal of spills, leaks, or other uncontrolled discharges, must be stored and disposed of in accordance with 40CFR § 761.60(a). Disposal of PCBs by any other manner constitutes the improper disposal of PCBs.

WASTE OILS

- ☒ Are waste oils tested for PCB's? (pre acceptance & prior to pumping Philips rescreen)
☒ Are waste oils generated, used, or stored at the facility?
 What is the source of the waste oils? _____
☒ Are waste oils picked up by a recycler?
 Name of recycler? _____
☒ Are waste oils burned at the facility?
 If yes: Has facility notified EPA-RCRA as used oil burner?
☒ Have any waste oils (50-500ppm) been shipped to a disposal facility? Who? _____
☒ Have any waste oils (50-500ppm) been sold for fuel or burned in a high efficiency boiler?
 If yes, was EPA notified of initial burn in the HEB? 761.60(a)(2)
☒ Are waste oils used or sold for: Road Oil, Dust Control, Rust Prevention, Sealants, Pesticide/Herbicide Carriers? 761.20(d)
☒ Are bulk storage tanks used for waste oils? (>55 gal DOT drum specs)
☒ Is an SPCC plan available for PCB-Contaminated bulk storage tanks?
☒ Are bulk storage tanks labeled? (Must label if PCB concentration is unknown or >50ppm.)
☒ Are in-out records (date/amt) available for bulk storage? 761.65(c)(8)
☒ Have PCB fluids (>500 ppm) ever been added to bulk storage tanks?
☒ Have PCB Contam fluids (50-500 ppm) ever been added to <50 ppm PCB bulk storage tanks?

STORAGE FOR DISPOSAL 761.65

- ☒ Is there a designated Storage for Disposal Area (SFD)?
☒ Marked with 6x6 M_L label?
☒ Adequate Roof and Walls to prevent rain from reaching PCB's or PCB items?
☒ Adequate Floor (smooth - impervious) with continuous 6" minimum curbing?
☒ Any drains or expansion joints present in the floor?
☒ Any sewer drains or sumps located in the SFD?
☒ Is containment volume adequate?
 (At least 2x internal volume of the largest PCB article/container or 25% of the total internal volume of all PCB articles or containers in storage.)
☒ Is the SFD above the 100-yr flood water elevation?
☒ Are any PCB's or PCB items stored within the SFD? Itemize-obtain inventory
☒ Are items dated when placed into storage?
☒ Are items checked every 30 days for leaks?
☒ Are leaks cleaned up immediately? Are leaking items overpacked? _____
☒ Are PCB-T, PCB Containers, or PCB Capacitors marked with M_L?
☒ Are any PCB-T in storage? How many? _____
☒ Are any PCB-T declared "for disposal" stored outside of the SFD?
☒ Are any PCB-Contam Elec Equip or PCB-Cap declared "for disposal" stored outside the SFD?
 If yes: 1. Is space = 10% of the volume of the Contaminated Trans available in the SFD?
 2. Are weekly inspections for leaks performed?
☒ Are any other areas being used to store PCB items for disposal? 761.65(c)
☒ Are items Dated? _____ Marked? _____
☒ Is the 30 day temporary storage limit observed?
☒ Are containers in a temporary storage area marked with M_L and date removed from service?

STORAGE FOR DISPOSAL (Continued)**Yes** **No**

Are liquids in containers >500 ppm?

If yes, are containers marked >500 ppm PCB?

(Temporary storage is NOT allowed for PCB liquids (>500 ppm))

Are PCB liquids (>500ppm) stored anywhere other than the SFD area?

Have any PCB's or PCB items been shipped to a disposal facility within the last 5 years?

Are shipping papers/manifests available for shipments?

Are any Mineral-Oil-T in storage? How many? ____

Are any Mineral-Oil-T in storage leaking?

Have these Mineral-Oil-T been tested for PCB's? (Obtain Serial No's and Test Records)

TRANSFORMERS*all energy provided by Seattle City Light*

Are any PCB-T (>500 ppm) in use?

Does facility own any PCB-T located in a Food/Feed facility? (Prohibited after 10/1/85)

Are any PCB T in a Network or Radial configuration?

What is the secondary voltage of the T?

Are T tested for PCB's by Gas-Chromatograph?

Have any PCB-T been installed (new location) since 10/1/85? Where? ____ When? ____

Have all PCB-T been registered *In writing* with primary fire response agency? Obtain copy

What is the Primary Fire Response Agency? ____

Were any leaking Mineral-Oil Transformers observed?

Were any leaking PCB-T or PCB-Contam-T observed? (Get serial numbers, location)

Is clean-up of leaks initiated within 48 hours of discovery?

Are daily checks of active leaks and drip pans made until leak is repaired or T is replaced?

Are PCB testing records available for all T?

Are PCB testing records available for leaking Mineral-Oil Transformers? OBTAIN RECORDS

Are PCB-T labeled with 6x6 M_L?

Have any Mineral-Oil-T been tested and found to be >500 ppm PCB?

Are means of access to PCB-T vaults/enclosures (exclude grates & manhole covers) marked w/ M_L?

Do all T have nameplates or documentation specifying type of dielectric fluid?

Are PCB-T serviced on site?

Are PCB contaminated rags/other wastes generated by servicing placed into drums in the SFD?

Are PCB's removed from the T during servicing?

If yes, are PCB's put back into the Transformer or placed into the SFD?

Are PCB-T coils removed during servicing? (Prohibited)

Are PCB liquids (>500 ppm) stored on site for servicing PCB-T? (Must be in SFD)

Are service records available for PCB-T?

Are Quarterly PCB-T inspections made (start 8-10-81)?

Are Quarterly inspection records maintained for at least 3 years after disposal?

Do Quarterly PCB-T inspection records include?

Location ____ Inspection Date ____ Inspectors Name ____

Date Leak Discovered ____ Location of Leak ____ Estimate of PCB released ____

Date of Cleanup ____ Containment ____ Repair ____ Description of Cleanup ____

Annual inspections may be performed in lieu of Quarterly IF:

1. Secondary-containment of 100% of the capacity of the T is provided or
2. PCB Conc of T is <60,000ppm, 90 days after service to reduce the PCB conc.

Have there been any fires involving PCB-T?

If yes, Date? __, Who responded? __, Did T rupture? ____

Was fire reported to National Response Center?

Are combustible materials stored: Inside a PCB-T enclosure?

Within 5 meters of a PCB-T enclosure?

Within 5 meters of a PCB-T?

CAPACITORS*Small capacitor -- a capacitor which contains <3# of dielectric fluid (<100 cubic in)**Large High Voltage Capacitor -- >=3# dielectric fluid and which operates at >=2000 volts**Large Low Voltage Capacitor -- >=3# dielectric fluid and which operates below 2000 volts a.c. or d.c.**Light ballasts are regulated for commercial sources.*

Are any PCB-Capacitors in use or in storage? How many? ____

Are >49 LHV or LLV C in use or storage?

If yes, are these C included in the Annual Report?

Are C marked with M_L? (LHVC in service need to be marked)

CAPACITORS (Continued)

<u>Yes</u>	<u>No</u>	
<input type="checkbox"/>	<input type="checkbox"/>	Has facility ever had >49 LHV/LLV C in use or storage within the last 5 years?
<input type="checkbox"/>	<input type="checkbox"/>	If yes, are annual reports on file for years when >49 C were in use or storage?
<input type="checkbox"/>	<input type="checkbox"/>	Have any C been removed from service?
<input type="checkbox"/>	<input type="checkbox"/>	If yes, have C been individually labeled with M _L ?
		Note: LLVC (<2000 volts) in service do not need M _L .
		LLVC (<2000 volts) must be labeled upon removal from service.
<input type="checkbox"/>	<input type="checkbox"/>	Are all Caps equipped with nameplates specifying type of dielectric fluid?
		(Capacitors without nameplates must be assumed to be PCB Capacitors.)
<input type="checkbox"/>	<input type="checkbox"/>	Are any PCB-C owned or maintained by the facility located in a Food or Feed Facility (FFF)?
		(These must be removed as of 10-1-88.)
<input type="checkbox"/>	<input type="checkbox"/>	Are any C manufactured after 7-1-78 in use at the facility?
		If yes, are these C marked "No PCB's" if they contain none?
<input type="checkbox"/>	<input type="checkbox"/>	Were any leaking C observed during the inspection?
		Note: Use of PCB-C after 10/1/88 is prohibited except for:
		1. Restricted Access and Contained Indoor Installation (Caps must be fenced off)
		2. Restricted Access Substation (Caps must be fenced off)

ANNUAL DOCUMENTS

Annual Document Logs should constitute single documents which include all of the required elements identified in § 761.180(a).

Annual Records constitute all signed manifests and all Cert of Disposal received during the calendar yr.

Annual REPORTS are required to be submitted by a COMMERCIAL STORER ONLY by 7/15 and is based on ADL & A. Records

<input type="checkbox"/>	<input type="checkbox"/>	Are Annual Document Logs (ADL) and Annual Records (AR) available?
<input type="checkbox"/>	<input type="checkbox"/>	Are ADL on calendar year basis? (§761.180(a)) -- 1989 must cover 1/1/89-2/5/90. 1990 (2/6/90-12/31/90)
<input type="checkbox"/>	<input type="checkbox"/>	Are PCB-T removed from service itemized in ADL?
<input type="checkbox"/>	<input type="checkbox"/>	Is the Total Weight (kg) of PCB's contained in these transformers shown?
<input type="checkbox"/>	<input type="checkbox"/>	Date removed from service?
<input type="checkbox"/>	<input type="checkbox"/>	Date placed into storage?
<input type="checkbox"/>	<input type="checkbox"/>	Date placed into transport for disposal?
<input type="checkbox"/>	<input type="checkbox"/>	Is Number of PCB-T and Total Wt (kg) of PCB's remaining in service at calendar year end shown?
<input type="checkbox"/>	<input type="checkbox"/>	Are LHV/LLV PCB Capacitors removed from service itemized?
<input type="checkbox"/>	<input type="checkbox"/>	Date removed from service?
<input type="checkbox"/>	<input type="checkbox"/>	Date placed into storage?
<input type="checkbox"/>	<input type="checkbox"/>	Date placed into transport for disposal?
<input type="checkbox"/>	<input type="checkbox"/>	Is the number of PCB LHV/LLV Caps remaining in service at year end shown?
<input type="checkbox"/>	<input type="checkbox"/>	Is the number of PCB Containers in the SFD area shown?
<input type="checkbox"/>	<input type="checkbox"/>	Is the Weight (kg) of these PCBs also shown?
<input type="checkbox"/>	<input type="checkbox"/>	Are the container contents identified?
<input type="checkbox"/>	<input type="checkbox"/>	Are PCB items in containers listed?
<input type="checkbox"/>	<input type="checkbox"/>	Date container placed into storage shown?
<input type="checkbox"/>	<input type="checkbox"/>	Date container placed into transport for disposal shown?
<input type="checkbox"/>	<input type="checkbox"/>	Are names/locations of disposal/storage facilities for PCB shipments shown?
<input type="checkbox"/>	<input type="checkbox"/>	Have any intermediate storage/disposal areas been used for PCB items earmarked for disposal?
<input type="checkbox"/>	<input type="checkbox"/>	Are ADL kept for 5 years?
<input type="checkbox"/>	<input type="checkbox"/>	Does ADL list the unique manifest number for all shipments during year? §761.180(a)(2)(ii)(C)
<input type="checkbox"/>	<input type="checkbox"/>	Do ADLs list total no of PCB containers and the total wt in KG of the contents of PCB containers?
<input type="checkbox"/>	<input type="checkbox"/>	Does each manifest include the following information.
		For bulk PCB waste -- Weight in kg _____ First date it was removed fr serv for disp _____
		Date placed into transport _____ Date of disposal if known _____
T & C		SN or ID of each article _____ Weight in kg of the PCB waste in each T or C _____
		OutSDate _____ InTransport Date _____ DisposalDate _____
Containers		Unique PCB container number _____ Description of contents _____
		Total wt of each container _____ Out of Service Date for material in container _____
		Date container put into transport for disposal _____ Date of Disposal _____

SPECIAL QUESTIONS

- _____ Is Anthraquinone (a.k.a. 9,10-Anthracenedione (CAS# 84-65-1) used by the facility in any process (Pulp & Paper)
 _____ If yes, get use description, length of use, supplier, testing for supplier, correspondence re anthraquinone.
- _____ Are any elevator hydraulic systems in use. Oils should be tested for PCB content.
- _____ Are any Diarylide or Phthalocyanin pigments in use or storage? 761.30(g)
- _____ Is any PCB mining equipment used or located at facility? 761.30(c)
- _____ Are any Railroad-T in use or located at facility? 761.30(b)
- _____ Was PCB conc measured after service or within 12-24 mo after PCB conc was reduced?
- _____ Are records kept of service, testing, use, storage, and disposal? (Must keep until 1-1-91)
- _____ Are any heat transfer systems containing PCB's in use? 761.30(d)
- _____ Are annual tests for PCB concentration made? Date of last test?
- _____ Have any annual tests shown PCB concentration to be >50ppm?
- _____ If yes, has system been drained and refilled with <50ppm PCB fluid?
- _____ Are these annual testing records kept for 5 years?
- _____ Are any PCB Electromagnets in use or storage at the facility? How many?
- _____ Have Electromagnets been tested for PCB concentration?
- _____ NOTE: Non-PCB fluid may be used to top-off Electromagnets. (Removal of internals prohibited)
- _____ Are Hydraulic systems containing PCB's in use? 761.30(e)
- _____ Has annual testing for PCB concentration been performed since 11/01/79?
- _____ NOTE: Annual tests are not required after PCB concentration reaches <50ppm.
- _____ Have any annual tests shown PCB concentration to be >50ppm?
- _____ If yes, has system been drained and refilled within 6 mos of test with <50ppm PCB fluid?
- _____ Was exemption obtained from EPA for use of hydraulic fluid containing >50ppm PCB?
- _____ NOTE: Hydraulic Systems containing >50 ppm PCB are PROHIBITED after 7/1/84.
- _____ Does facility use, recycle or dispose of Lead (Pb)? Solder • smelter • shooting range • mine • other?

COMMERCIAL BUILDING REGULATIONS

- _____ Are means of access to PCB-T locations (excluding grates & manhole covers) marked with M_L?
- _____ Are any commercial buildings located on facility property? (Building w/public & employee access)
- _____ Are any PCB-T IN or WITHIN 30 METERS of the Commercial Building?
- _____ If yes, how many? _____ Where located? _____
- _____ Who owns the PCB-T? _____
- _____ If owned by Utility, are the PCB-T registered IN WRITING with building owner?
- _____ If owned by the building owner, are PCB-T registered in writing with fire department?
- _____ Are any PCB-T located in a sidewalk vault?
- _____ Do they have current-limiting fuses (or other equivalent protection) to detect:
- _____ Sustained high current faults?
- _____ Sustained low current faults?
- _____ Are PCB-T: Radial? _____ Network? _____ High Secondary Voltage 480V? _____
- _____ Low secondary voltage? _____
- _____ Do LSV Network and HSV Radial PCB-T in/near the Cmercl Bldg have enhanced elect protect?
- _____ Current-limiting fuses? _____, Overcurrent protective relays? _____, Circuit Breakers? _____
- _____ Heat or Ultraviolet sensors? _____, Pressure sensors? _____, Fluid Level Sensor? _____

INSPECTION PROCEDURES

- _____ Were Inspector's credentials presented?
- _____ Was "Notice of Inspection" presented?
- _____ Was "TSCA Inspection Confidentiality Notice" presented?
- _____ Were photographs taken?
- _____ Were samples taken during the inspection?
- _____ Was a "Receipt for Samples and Documents" given to the facility representative?
- _____ Were Chain of Custody procedures followed for samples?
- _____ Were split samples offered to the facility?
- _____ Were split samples given to the facility?
- _____ Was warrant required?

Reason for Inspection: Neutral Scheme _____ Complaint _____ Informant _____

Agency Referral _____ Follow-Up _____

Multimedia _____